

Amy L. Thompson, Esq.  
Bar No. 11907  
LITTLER MENDELSON, P.C.  
3960 Howard Hughes Parkway  
Suite 300  
Las Vegas, Nevada 89169.5937  
Telephone: 702.862.8800  
Fax No.: 702.862.8811  
E-mail: [athompson@littler.com](mailto:athompson@littler.com)

Attorney for Defendant  
HARTFORD LIFE AND ACCIDENT INSURANCE  
COMPANY

UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

VIRGINIA ROLLINS,

Plaintiff,

v.

HARTFORD LIFE AND ACCIDENT  
INSURANCE COMPANY,

Defendant.

Case No. 2:22-cv-00969-JCM-NJK

**STIPULATION AND PROPOSED  
ORDER TO EXTEND DEADLINES  
(SECOND REQUEST)**

Pursuant to Local Rule IA 6-1 and Local Rule 26-3, Defendants HARTFORD LIFE AND ACCIDENT INSURANCE COMPANY (“Defendant”) and Plaintiff VIRGINIA ROLLINS (“Plaintiff”) (collectively, the “Parties”), hereby stipulate to amend the Discovery Plan and Scheduling Order (**ECF No. 18**) by extending the outstanding deadlines for a period of forty-five (45) days.

This is the second request for an extension to the Discovery Plan and Scheduling Order in this matter. The requested extension is sought in good faith and not for purposes of undue delay. This request is submitted at least twenty-one (21) days or more before the expiration of the subject deadlines.

///

///

///

///

## DISCOVERY COMPLETED

This case is exempt from initial disclosures as an action decided upon the administrative record under Rule 26(a)(1)(B)(i). The parties do not anticipate discovery in this matter beyond the administrative record.

## REASONS FOR REQUESTED EXTENSIONS

This extension is necessary as the parties have been engaged in settlement discussions and have agreed to privately mediate this matter. A mediation has been scheduled for March 8, 2023. The parties desire to divert resources toward mediation at this time before incurring the time and expense of preparing dispositive motions.

## PROPOSED REVISED DISCOVERY PLAN

### C. Proposed Case Schedule and Deadlines

#### 1. Dispositive Motions.

- The current deadline for Hartford to file a Motion for Summary Judgment is March 21, 2023. The parties request this deadline be extended to **May 5, 2023**.
- The current deadline for Plaintiff to file a Response to Defendant's Motion for Summary Judgment and Cross Motion for Summary Judgment is April 11, 2023. The parties request this deadline be extended to **May 26, 2023**.
- The current deadline for Hartford to file a Response to Plaintiff's Cross Motion for Summary Judgment is May 2, 2023, if desired. The parties request this deadline be extended to **June 16, 2023**.
- The current deadline for Plaintiff to file a Reply is May 16, 2023, if desired. The parties request this deadline be extended to **June 30, 2023**.

///

///

///

**2. Extensions or Modifications of the Scheduling Order.**

Should an extension of any of the above-listed deadlines become necessary, absent extenuating circumstances constituting good cause and/or excusable neglect, the Parties will request such at least twenty-one (21) days in advance of the subject deadline pursuant to LR 26-3.

Dated: February 2, 2023

Dated: February 2, 2023

/s/ Martina B. Sherman, Esq.  
JULIE A. MERSCH, ESQ.  
LAW OFFICES OF JULIE A. MERSCH

/s/ Amy L. Thompson, Esq.  
AMY L. THOMPSON, ESQ.  
LITTLER MENDELSON

MARTINA B. SHERMAN, ESQ.  
DEBOFSKY LAW, LTD.

Attorney for Defendant  
HARTFORD LIFE AND ACCIDENT  
INSURANCE COMPANY

Attorneys for Plaintiff  
VIRGINA ROLLINS

**IT IS SO ORDERED.**

Dated: February 3, 2023

  
UNITED STATES MAGISTRATE JUDGE

4867-7877-2299.1 / 116071-1003